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8 Attorneys for Plaintiff
SONY COMPUTER ENTERTAINMENT AMERICA LLC

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10 UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF CALIFORNIA
11 SAN FRANCISCO DIVISION

12 SONY COMPUTER ENTERTAINMENT
13 AMERICA LLC, a Delaware limited liability
company,

14 Plaintiff,

15 v.

16 ZOOMBA LDC;
WWW.SHOPPSJAILBREAK.COM; VLAD
GAZOUNE, individually and doing business
17 as ZOOMBA LDC and
WWW.SHOPPSJAILBREAK.COM; THAHN
18 NGUYGEN, individually and doing business
as USATECHCITY, LTD; ARTHUR BATES
19 II, individually and doing business as PSP
PIT STOP; TOM NOOKER, individually and
20 doing business as
WWW.BUYPS3JAILBREAK.WEBS.COM;
21 ALEX ESQUIVEL, individually and doing
business as NDSGAMER; BIN LE ZHONG
22 aka BEN LEE, individually and doing
business as
23 WWW.PS3BREAKONLINE.COM; and FAI
KING FONG, individually and doing business
24 as WWW.PS3BREAKONLINE.COM; and
HUANRAN LEE, individually and doing
25 business as WWW.GETPS3BREAK.COM;
and DOES 9 through 100,

26 Defendants.
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Case No. C10-03909 RS

**REQUEST AND ~~PROPOSED~~ ORDER
TO CONTINUE FEBRUARY 24, 2011
CASE MANAGEMENT CONFERENCE**

Judge: Hon. Richard Seeborg



1 Plaintiff Sony Computer Entertainment America LLC ("SCEA") hereby requests
2 that the Initial Case Management Conference which is currently scheduled for February
3 24, 2011 be continued for approximately 60 days until April 21, 2011.

4 This case involves two foreign and six United States defendants. All of the United
5 States defendants have been served, but none have filed answers to the complaint or
6 made appearances in this action. The foreign defendants have not yet been served.
7 Only three of the United States defendants (Thahn Nguyen of USATech City, Ltd. and
8 Bin Le Zhong and Fai King Fong of Ps3breakonline.com) are represented by counsel.
9 Since the Court entered the Preliminary Injunction Order on October 10, 2010 [Docket
10 No. 49], counsel for SCEA has been engaged in discussions with the United States
11 defendants regarding compliance with the Order and the possibility of resolving SCEA's
12 claims against some of the defendants, as well as possible entry of consent judgments
13 and permanent injunctions.

14 In light of the circumstances, SCEA believes it would be appropriate to continue
15 the Initial Case Management Conference for a sufficient amount of time to allow these
16 discussions to proceed. Counsel for SCEA has notified all of the defendants of SCEA's
17 intent to seek a continuance of the Initial Case Management Conference. Counsel for
18 defendants Thahn Nguyen, Bin Le Zhong and Fai King Fong responded that they do not
19 object to a continuance. None of the other defendants responded to counsel for SCEA.
20 Accordingly, SCEA respectfully requests that the Initial Case Management Conference
21 currently set for February 24, 2011 be continued approximately 60 days to April 21, 2011.

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1 DATED: February 17, 2011

Respectfully submitted,

2 KILPATRICK TOWNSEND & STOCKTON LLP

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4 By: /s/ Holly Gaudreau

JAMES G. GILLILAND, JR

TIMOTHY R. CAHN

HOLLY GAUDREAU

6 RYAN BRICKER

7 Attorneys for Plaintiff

8 SONY COMPUTER ENTERTAINMENT AMERICA

LLC

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10 **[PROPOSED] ORDER**

11 It is hereby ordered that the Request to Continue the Initial Case Management
12 Conference is GRANTED. The Initial Case Management Conference is hereby
13 scheduled for April 21, 2011.

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15 IT IS SO ORDERED.

16 DATED: 2/18/11

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HON. RICHARD SEEBORG
UNITED STATES DISTRICT JUDGE

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